



# CALIFORNIA FARM BUREAU FEDERATION

## NATURAL RESOURCES AND ENVIRONMENTAL DIVISION

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March 18, 2004

Jeremy Arrich  
DWR, DPLA  
P.O. Box 942836  
Sacramento, CA 94236-0001

Re: Scoping Comments for In-Delta Storage Feasibility Studies

Dear Mr. Arrich:

The California Farm Bureau Federation ("Farm Bureau") is a non-profit voluntary membership corporation whose purpose is to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable food and fiber supply through responsible stewardship of California's land, water and air resources. Our membership consists of 89,000 members throughout California who are farmers and ranchers or otherwise concerned about the future of agriculture and rural communities in California.

We are pleased that the Department of Water Resources ("DWR") came to the CALFED Working Landscapes Sub-Committee to discuss CALFED's In-Delta Storage feasibility studies ("Delta Wetlands project"). We were encouraged by DWR's explanation of its preliminary California Environmental Quality Act ("CEQA") analysis of agricultural resources; specifically its use of the Land Evaluation Site Assessment ("LESA") model and its ongoing discussions of mitigation options with local governments and the Department of Conservation.


At the Working Landscapes meeting, DWR staff identified some issues surrounding the potential cost and feasibility of using agricultural easements to mitigate the impacts of the Delta Wetlands project. We do not believe easements are the only mitigation option that may effectively mitigate the impacts of the project. However, easements should be considered as a potentially feasible option. We would like to remind DWR that agriculture is a valuable resource in its own right. Its value as a buffer against urban sprawl is only a secondary benefit. As such, it is not necessary only to consider potential easement sites that are adjacent to urban development. DWR should

be looking at agricultural resources that are of comparable quality and in the same region as the resources impacted by the Delta Wetlands project.

It is our understanding that an analysis of agricultural resources has not been undertaken for two of the islands, pending a new management plan. We look forward to the inclusion of these islands in a future CEQA analysis.

Thank you for consideration of these issues. If you have any questions, feel free to me at (916) 561-5667.

Sincerely,



Becky Sheehan

BDS/sm